

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: ERICA M. WILLIAMS
AKA: ERICA WILLIAMS, ERICA
MONIQUE WILLIAMS

CHAPTER 13

Debtor(s)
JACK N. ZAHAROPOULOS
CHAPTER 13 TRUSTEE
Movant
vs.
ERIC M. WILLIAMS et al
Respondent(s)

CASE NO: 5-20-01367-MJC

TRUSTEE'S MOTION TO DISMISS CASE

AND NOW, on December 21, 2021, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Agatha R. McHale, Esquire, and respectfully represents the following:

1. An Amended Plan was filed on April 6, 2021.
2. A hearing was held and an Order was entered on October 6, 2021 directing that an amended plan be filed within thirty (30) days.
3. As of the date of this Motion, an amended plan has not been filed.
4. The delay in filing a confirmable plan in this case is prejudicial to creditors.

WHEREFORE, your Trustee respectfully requests your Honorable Court dismiss the case upon the basis that Debtors have failed to propose a confirmable plan.

Respectfully submitted,

/s/ Agatha R. McHale, Esq.
Id: 47613
Attorney for Movant
Jack N. Zaharopoulos
Standing Chapter 13 Trustee
Ste. A, 8125 Adams Drive
Hummelstown, PA 17036
Ph. 717-566-6097
Fax. 717-566-8313
email: amchale@pAMD13trustee.com

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NOTICE

NOTICE IS HEREBY GIVEN that Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania has filed a Motion to Dismiss for failure to file a confirmable Chapter 13 Plan.

YOU ARE HEREBY NOTICED that a hearing has been scheduled on this matter for:

U.S. Bankruptcy Court
Max Roseann U.S. Courthouse
Courtroom #2
197 S. Main Street
Wilkes Barre, PA

Date: January 25, 2022
Time: 09:30 AM

Any objection or response filed must be filed with the Clerk, U.S. Bankruptcy Court and served on the Chapter 13 Trustee.

/s/ Agatha R. McHale, Esquire
ID: 47613
Attorney for Movant
Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
Phone: (717) 566-6097
email: info@pAMD13trustee.com

Dated: December 21, 2021

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FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: ERICA M. WILLIAMS
AKA: ERICA WILLIAMS, ERICA MONIQUE CHAPTER 13
WILLIAMS

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CHAPTER 13 TRUSTEE
Movant
ERICA M. WILLIAMS et al
CASE NO: 5-20-01367-MJC

Respondent(s)

CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on December 21, 2021, I served a copy of this Motion to Dismiss, Notice and Proposed Order on the following parties by 1st Class mail from Hummelstown, PA, unless served electronically.

Served electronically

TULLIO DeLUCA, ESQUIRE
381 N 9TH AVENUE
SCRANTONPA18504-

United States Trustee
228 Walnut Street
Suite 1190
Harrisburg, PA 17101

Served by 1st Class Mail

ERICA M. WILLIAMS
304 WHIPPORWILL LANE
EAST STROUDSBURG, PA 18302

I certify under penalty of perjury that the foregoing is true and correct.

Date: December 21, 2021

Respectfully,
/s/ Vickie Williams
for Jack N. Zaharopoulos,
Standing Chapter 13 Trustee
Suite A, 8125 Adams Dr.
Hummelstown, PA 17036
Phone: (717) 566-6097
email: info@pamd13trustee.com

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ORDER DISMISSING CASE

Upon consideration of the Trustee's Motion to Dismiss, it is hereby Ordered that the above-captioned bankruptcy be and hereby is dismissed. The Court retains jurisdiction to rule on any timely filed fee application.